

Internal Consistency of General Plan

State law requires the Housing Element contain a statement of “the means by which consistency will be achieved with other general plan elements and community goals” (California Government Code, Section 65583[c][6][B]). There are two aspects of this analysis: 1) an identification of other General Plan goals, policies, and programs that could affect implementation of the Housing Element or that could be affected by the implementation of the Housing Element, and 2) an identification of actions to ensure consistency between the Housing Element and affected parts of other General Plan elements.

The Morgan Hill General Plan contains several elements with policies related to housing. Policies and the means for achieving consistency are summarized below in Table 1. The City will ensure consistency between the Housing Element and General Plan policies through the following actions in the Housing Element:

Table 1		
Consistency of Housing Element with Other General Plan Policies		
General Plan Element	Policy	Means for Achieving Consistency
Community Development	Policy 2.a	<p><i>Encourage the orderly development of the city, with concentric growth and infill of existing developed areas.</i></p> <p>The General Plan designates areas for future residential development primarily within and adjacent to existing developed areas. This policy is reinforced through zoning that provides for higher densities in these areas.</p>
	Policy 2.b	<p><i>Ensure that facility/service standards can be met for new development by the time of occupancy.</i></p> <p>The City updates its capital improvement plan and budget annually to ensure that infrastructure is available to serve new residential development prior to occupancy.</p>
	Policy 2.d	<p><i>Plan for the needs of all socioeconomic segments of the community, encouraging self-sufficiency in jobs and housing within the city.</i></p> <p>The City has implemented a balanced approach to growth through the distribution of land uses for residential, commercial, and industrial purposes in the General Plan. The City’s General Plan and zoning provides for a range of residential densities to meet the housing needs of all income groups. The objective of providing for all income groups is further reinforced through the City’s Residential Development Control System (RDSCS), which sets-aside 20 percent of the housing unit allocation for developments that contain 100 percent affordable housing and awards points for market-rate developments that include affordable housing.</p>

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	Policy 6.a	<p><i>Avoid development in areas of natural hazards such as landslide and flood prone areas.</i></p> <p>The City's zoning and development standards ensure that residential development does not expose residents to unreasonable levels of natural hazards.</p>
	Policy 6.b	<p><i>Encourage the clustering of residential units to provide open space and recreation areas, and to provide buffer areas between different land uses.</i></p> <p>The General Plan Community Development Element and implementing zoning provide for a range of residential developments, allow planned developments, and encourage clustering of dwelling units to preserve open space.</p>
	Policy 6.c	<p><i>Evaluate potential impacts of development projects on adjacent uses in initial environmental assessments and EIRs.</i></p> <p>The City's environment assessment procedures require consideration of potential adverse environmental impacts from new development and mitigation of those impacts, if feasible. The General Plan Community Development Element contains policies to reduce potential conflicts among land uses.</p>
	Policy 7.b	<p><i>Plan for an approximate 70/30 ratio of single family detached to single family attached and multi-family housing for all residential development.</i></p> <p>The City's General Plan Community Development Element distributes land uses among low, medium, and high density residential uses. To date, the result has been that about 28% of the City's housing stock consists of attached single-family and multifamily dwellings. This policy has not limited the City's ability to zone sufficient land to meet its very low-, low-, and moderate-income housing needs or to allocate such units through the RDCS. If this policy creates a constraint in the future, the City may need to re-evaluate the 70/30 policy and its implementation through the RDCS.</p>
	Policy 7.c	<p><i>Under the RDCS procedures, continue to emphasize single-family development in the distribution of units between single and multi-family development.</i></p> <p>To date, these policies have not limited the City's ability to zone or allocate sufficient units at appropriate densities to meet its housing needs for all income groups. Currently, the City's RDCS system includes a set-aside for affordable housing and points for market-rate developments that contain affordable units. The City will re-evaluate and modify this policy in the future if it creates a constraint to accommodating the City's affordable housing needs.</p>

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	Policy 7.d	<p><i>Encourage higher residential densities at locations where convenient access and adequate infrastructure is readily available.</i></p> <p>The City has taken these criteria into consideration in assigning land use designations under the General Plan.</p>
	Policy 7.e	<p><i>Provide for an adequate supply of multi-family housing, located convenient to shopping, services, and transportation routes.</i></p> <p>See explanation of policy 7.d.</p>
	Policy 7.f	<p><i>Continue to provide for mobile home parks and modular home developments at appropriate locations within the city, employing high standards of site planning and design.</i></p> <p>The City continues to permit manufactured housing on single-family lots and mobilehome parks in residential areas, subject to development policies contained in the Community Development Element and standards included in the Zoning Ordinance.</p>
	Policy 7.h	<p><i>Utilize all parcel sizes and land use categories in updating the City's Zoning Ordinance to provide for al full range of residential densities and housing types.</i></p> <p>The City's zoning code permits densities of up to 40 dwelling units per acre on appropriate sites, sufficient for a range of housing unit types, from single-family homes on large lots to rental apartments. The City also permits housing in the mixed use zoning district, further increasing the range of residential options.</p>
	Policy 7.i	<p><i>Encourage a mix of housing types and lot sizes within residential projects with five or more lots or units.</i></p> <p>The point system contained in the RDCS encourages this mix.</p>
	Policy 7.j	<p><i>Support actions to maintain an adequate supply of single family housing throughout the community, including provision of affordable single family housing to those persons who work within the community.</i></p> <p>The City has identified sufficient land zoned for single-family use to meet the City's needs through at least 2020. The General Plan and implementing zoning provide for a medium-density residential category that encourages the production of small-lot and/or attached single-family homes that are affordable to moderate-income households.</p>

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	Policy 7.k	<p><i>To the maximum extent possible, emphasize single-family units in affordable housing allocations, rental and ownership housing assistance projects, and rehabilitation programs to improve the existing housing stock.</i></p> <p>Application of the RDCS point system encourages the inclusion of affordable single-family homes in market-rate projects. Most of these homes are affordable to moderate-income households, although a few have been affordable to low-income households. The RCDS also includes a 20 percent set-aside for 100 percent affordable housing developments. General Plan policies encourage the preservation of existing residential neighborhoods, and the Redevelopment Agency has implemented these policies by providing funding for housing rehabilitation.</p>
	Policy 7.l	<p><i>Encourage preservation and rehabilitation of single-family neighborhoods within the city.</i></p> <p>See policy 7.k</p>
	Policy 7.m	<p><i>Allow residential uses in commercial zones and residential and commercial uses within a structure in a commercial zone, subject to meeting performance standards.</i></p> <p>The General Plan and implementing zoning allow residential uses (either as stand-alone or mixed-use projects) in the Central Commercial-Residential district.</p>
	Policy 7.n	<p><i>Subject mobile home park and subdivision development to RPD zoning.</i></p>
	Policy 7.p	<p><i>Provide housing at a range of costs that meet the needs of all sectors of the workforce.</i></p> <p>The City's General Plan land use designations, implemented through the Zoning Ordinance and the RDCS, encourage a mix of housing types and cost ranges. The Community Development Element provides for a range of residential densities, up to 40 dwelling units per acre.</p>
	Policy 7.q	<p><i>The area designated for Single Family Low Density residential use located at the southwest corner of the intersection of Murphy and Diana Avenues shall be implemented using the R-1 12,000 zoning district.</i></p> <p>The designation of this area as R-1 12,000 is consistent with the range of residential densities encouraged under the Housing Element and will not conflict with the City's ability to accommodate its future housing needs under the Housing Element.</p>

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Consistency of Housing Element with Other General Plan Policies

	Policy 8.a	<p><i>Maintain distinct boundaries between commercial uses and residential neighborhood.</i></p> <p>The General Plan land use diagram provides for appropriate boundaries between commercial and residential areas. General Plan policies also permit residential and residential-commercial mixed-use projects in the Central Commercial – Residential zone. Buffers between residential and commercial uses can be required as part of the site design process.</p>
	Policy 8.b	<p><i>Require any higher-density multi-family developments to include site design and a variety of unit types to mitigate potential impacts typically associated with larger projects.</i></p> <p>The City's RDCS includes points for project design that address impacts associated with higher-density development. The City has applied the RDCS system to ensure both high quality design and affordability of housing for all income groups.</p>
	Policy 8.c	<p><i>Design residential neighborhoods so they are distinct and separated from conflicting non-residential uses.</i></p> <p>See policy 8.a.</p>
	Policy 12.a	<p><i>Avoid monotony in the appearance of residential development.</i></p> <p>The City's RDCS includes points for creative project design.</p>
	Policy 12.d	<p><i>Rehabilitate or replace run-down, blighted buildings and developments, including trailer courts.</i></p> <p>The Community Development Element of the General Plan includes policies for preserving for existing residential neighborhoods when possible. The Morgan Hill Redevelopment Agency has used its funds to rehabilitate or replace housing to achieve these policies.</p>
	Policy 13.1	<p><i>Encourage residential uses on upper floors above commercial uses in the downtown area.</i></p> <p>The Community Development Element and implementing zoning provide for residential uses on upper floors above commercial uses and ground floor elsewhere, which potentially permits a broader range of housing options to achieve the objectives of the Housing Element.</p>
	Policy 15.b	<p><i>Maintain existing residential feathering [transitional features] south of Watsonville Road and west of Monterey Road, and maintain the residential estate designation east of Monterey Road to the railroad.</i></p> <p>The City has adopted land use designations, implementing zoning, and design standards to achieve a transition from rural to urban uses. This transition is consistent with the Housing Element, which seeks to provide for a range of residential development patterns and housing types.</p>

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	Policy 19.k	<p><i>In order to avoid de facto segregation in schools, plan housing for low and moderate-income families throughout the South County where urban services are available. Avoid concentration of such housing in any one area.</i></p> <p>Through the application of land use designations in the General Plan and the RDCS system, the City has avoided over-concentration of any one housing type in a specific part of the City.</p>
	Policy 20.b	<p><i>Septic systems should be used only for low-intensity uses where they will not have a negative impact on the environment.</i></p> <p>The City requires new housing units to connect to the public sewer system, unless the property owner can show adequate site and soil capability to store and process wastewater on site.</p>
	Policy 21.b	<p><i>Ensure that new development does not exceed the water supply.</i></p> <p>Anticipated development, including residential development at least through 2006, will not result in a shortage of storage, treatment, or distribution capacity that would negatively impact the City's ability to accommodate its regional housing allocation for all income groups.</p>
	Policy 21.f	<p><i>Protect streambeds and other appropriate percolation areas from encroachment by urban development.</i></p> <p>The General Plan designates land uses for urban development and contains policies for direct development away from such environmentally sensitive areas. The City does not anticipate that the presence of such sensitive areas will affect the ability of Morgan Hill to accommodate future housing needs under the Housing Element.</p>
Economic Development	Policy 1.f	<p><i>Encourage mixed-use development downtown with residences above ground floor commercial uses.</i></p> <p>See policy 13.1.</p>
	Policy 2.c	<p><i>Balance job and housing supplies to minimize housing cost increases, traffic congestion and commute times, and to optimize economic diversity and capacity to provide services.</i></p> <p>See policy 2.d.</p>
Circulation	Policy 3.c	<p><i>Require developers to provide for the construction of their portion of arterial and collector streets at the time of development.</i></p> <p>The City's Zoning Ordinance, with accompanying impact fees, implements this policy and ensures that new residential development is adequately served by appropriate circulation systems.</p>

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	Policy 5.a	<p><i>Ensure that all developments provide adequate and convenient parking.</i></p> <p>The City has implemented this General Plan policy through parking standards in the Zoning Ordinance. Parking standards vary by the type of residential development (single-family, multifamily, senior housing, mixed-use development, etc.) The City may apply parking standards in a flexible manner so as not to create an unreasonable financial burden on affordable housing developments and balance Housing Element policies with Circulation Element policies.</p>
	Policy 6.d	<p><i>Development shall be designed to conserve soil and avoid erosion.</i></p> <p>The General Plan designates future residential development to avoid areas subject to significant erosion. The City has also implemented development standards to mitigate erosion during the development process and on-site and downstream erosion resulting from developed lands containing impermeable surfaces.</p>
	Policy 7.a	<p><i>New development should be designed to exceed State standards for the use of water and energy.</i></p> <p>The City's RDCS provides points for development projects that include water and energy conserving features exceeding state standards. These conservation measures do not significantly add the initial cost of residential development and save operating costs over the life of a residential unit. This policy does not impede the City's ability to achieve affordable housing objectives under the Housing Element.</p>
	Policy 7.b	<p><i>Promote energy conservation techniques and energy efficiency in building design, orientation and construction.</i></p> <p>The City implements state energy conservation standards contained in Title 24 of the California Code of Regulations (California Building Code Standards) for new construction. These standards create a net benefit for new residential structures by significantly reducing energy costs over the life of a housing unit. Implementation of these standards does not impede the City's ability to achieve affordable housing objectives under the Housing Element.</p>
	Policy 7.j	<p><i>The incorporation of renewable energy generating features, like solar panels, should be encouraged in the design of new development and in existing development.</i></p> <p>See explanation of Policy 7.a.</p>
	Policy 7.k	<p><i>Promote water conservation and efficient water use in all public and private development projects and landscaping plans.</i></p> <p>See explanation of policies 7.a and 7.b.</p>

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Public Health and Safety	Policy 1.a	<p><i>Limit uses on lands with geologic hazards.</i></p> <p>The General Plan designates land uses to avoid geologic hazards. The City has determined that sufficient land is available to meet future residential needs without development of areas subject to geologic hazards. Areas of the City designated for the highest density urban development are potentially exposed to seismic hazards from known or inferred faults within the Morgan Hill planning area and the region. The City implements seismic safety requirements of the California Building Code Standards to mitigate seismic hazards, however.</p>
	Policy 1.b	<p><i>Where urban development has already occurred and there has been extensive capital improvements made, use mitigation procedures for development on lands with geologic hazards, including geologic investigations on a scale commensurate with development where geologic data indicates there is a known or suspected problem.</i></p> <p>The City has implemented development standards that require geological investigations and mitigations for potential site-specific conditions (such as potential for slope failure due to seismic activity). This requirement primarily applies to areas of significant slope or near known or inferred hazards (such as fault lines). The requirement for site-specific investigations does not significantly constrain housing availability or affordability in areas designated for higher density residential development.</p>
	Policy 1.d	<p><i>Known or potential geologic, fire, and flood hazards should be reported as part of every real estate transaction, as well as recordation on documents to be reported for building permits, subdivisions and land development reports. Mitigation hazards should be noted in the same manner.</i></p> <p>The reporting process is a requirement of state law implemented by the City through its building permit process, although the City does not have direct responsibility for regulating real estate transactions.</p>
	Policy 1.g	<p><i>New development should avoid hazardous and sensitive areas, and should occur only where it can be built without risking health and safety. New habitable structures should not be allowed in areas of highest hazard such as floodways, active landslides, active fault traces, and airport safety zones. In areas of less risk, development should be limited and designed to reduce risks to an acceptable level.</i></p> <p>See explanation of policy 1.a and 1.d.</p>
	Policy 1.h	<p><i>Hillsides should be protected, and development should be carefully controlled on steep slopes. When hillside land is developed, it should be done with minimum disruption of topography and vegetative cover.</i></p> <p>See explanation of policy 1.a and 1.d</p>

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	Policy 1.j	<p><i>Keep development in hazardous areas to a minimum by encouraging low-density, low-intensity uses and the types of uses least disruptive to the soil and vegetative cover.</i></p> <p>See explanation of policy 1.a and 1.d</p>
	Policy 1.l	<p><i>Prohibit development on known active landslides and limit development in areas where such development might initiate sliding or be affected by sliding on adjacent parcels.</i></p> <p>See explanation of policy 1.a and 1.d</p>
	Policy 1.m	<p><i>Prohibit development in areas where increased runoff from the addition of impervious surfaces and drainage would increase the probability of downslope landsliding, or where additional projects would add to the cumulative effect of increased runoff, unless a downslope drainage improvement plan has been approved.</i></p> <p>See explanation of policy 1.a and 1.d</p>
	Policy 1.n	<p><i>Cluster development in hazardous areas with dwellings grouped on the least hazardous portion of the property.</i></p> <p>See explanation of policy 1.a and 1.d</p>
	Policy 1.o	<p><i>Limit development in less hazardous areas and design it to reduce risks to an acceptable level.</i></p> <p>See explanation of policy 1.a and 1.d</p>
	Policy 2.a	<p><i>Ensure that appropriate precautions are taken during development to minimize the risk of fire and/or explosion associated with high-pressure gas lines.</i></p> <p>The City regulates the types of land uses and structures near high-pressure gas lines and development activities that could impact such lines through implementation of the California Building Code Standards.</p>
	Policy 2.b	<p><i>Minimize development in fire hazard areas and plan and construct permitted development so as to reduce exposure to fire hazards and to facilitate fire suppression efforts in the event of a wildfire.</i></p> <p>The General Plan identifies areas subject to fire hazards (generally vegetated hillside areas) and designates land use patterns to mitigate potential exposure to fire hazards. The City also implements development standards in the Zoning Ordinance and the California Building Code Standards to reduce fire hazards while accommodating housing needs identified in the Housing Element.</p>

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Consistency of Housing Element with Other General Plan Policies

	Policy 2.c	<p><i>Avoid actions that increase fire risk, such as increasing public access roads in fire hazard areas, because of the great environmental damage and economic loss associated with a large wildfire.</i></p> <p>See explanation of policies 2.a and 2.b.</p>
	Policy 4.b	<p><i>Prohibit development in floodways and regulate in floodplains to minimize flood damage and be consistent with the federal flood insurance program and Santa Clara Valley Water District regulations.</i></p> <p>The General Plan designates land uses to avoid development in floodplains. None of the areas designated for future residential development to meet the City's Housing Element objectives will require development in flood-prone areas.</p>
	Policy 4.c	<p><i>Limit development along the shores of reservoirs which can be expected to sustain damage from seismically-induced seiche waves.</i></p> <p>The General Plan does not designate areas for future residential development adjacent to a reservoir.</p>
	Policy 4.d	<p><i>Continue restricting development in areas of poor accessibility. Development should not be allowed in areas where access is provided by a single road that could be damaged by faulting or landslides, or where access could be cut off by wildfires, trapping residents or workers.</i></p> <p>This policy applies primarily to hillside areas and will not affect the City's ability to accommodate future housing needs as identified in the Housing Element.</p>
	Policy 4.h	<p><i>Areas which are developed or planned for development should be protected by the construction of flood control facilities. Development should be managed through advanced planning and design standards to minimize off-site flooding and drainage problems.</i></p> <p>The City requires appropriate flood control facilities as part of each new development. In addition, the City implements a capital facilities plan to coordinate the construction of citywide flood control facilities and facilities serving multiple properties. Through these requirements, Morgan Hill will continue to accommodate its housing needs while mitigating potential flood damage.</p>
	Policy 4.j	<p><i>If federal and state funds are not available for future flood control facilities and such facilities must be funded locally, assess the costs to those property owners who would benefit from and those who contribute to the need for such facilities.</i></p> <p>See explanation of policy 4.h. The City may reduce fees or use redevelopment funds to pay a portion of the costs of flood control for affordable housing projects that may be impacted by this additional cost.</p>

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	Policy 4.k	<p><i>Require developers whose proposed projects would induce downstream flooding to provide mitigation to eliminate the flood-inducing impacts of their projects.</i></p> <p>See explanation of policies 4.h and 4.j.</p>
	Policy 4.l	<p><i>If development is to be allowed in flood-prone areas, provide flood control facilities or appropriate flood-proofing prior to or in conjunction with development at developer's expense.</i></p> <p>See explanation of policies 4.h and 4.j.</p>
	Policy 4.n	<p><i>Require mitigation of any storm water runoff produced by development that occurs beyond that described in the General Plans of the City and County as of 1982.</i></p> <p>See explanation of policies 4.h and 4.j.</p>
	Policy 4.o	<p><i>Require all local development to provide appropriate mitigation of off-site flooding impacts, including limiting runoff to pre-development levels and/or complete solutions to flooding and local drainage problems in the vicinity of the development, using such methods as detention or retention.</i></p> <p>See explanation of policies 4.h and 4.j.</p>
	Policy 4.p	<p><i>Require careful consideration of the cumulative effects of development which would drain into the upper reaches of Llagas Creek and other creeks, in order to avoid the need for channelization and consequent destruction of its riparian vegetation and natural habitat.</i></p> <p>The General Plan designates land uses to avoid impacting these watercourses. Residential development permitted in these areas will be low density and low-impact.</p>
	Policy 5.c	<p><i>Continue land use policies that limit the number of individual septic systems in areas vulnerable to groundwater contamination, because of the potential for cumulative degradation of water quality.</i></p> <p>The General Plan designates areas for low-density residential development where septic systems may be appropriate and implements development standards (including requirements for site investigations) to assure the capability of such sites to accommodate septic systems.</p>
	Policy 5.e	<p><i>In area where future development is not expected to be served by sewers, continue large lot policies which allow minimal development and limited numbers of septic systems.</i></p> <p>See explanation of policy 5.c.</p>

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	Policy 7.a	<p><i>New development projects shall be designed and constructed to meet acceptable exterior noise level standards.</i></p> <p>The General Plan designates land uses to mitigate impacts on noise-sensitive land uses (such as schools and residential uses) by noise generating land uses. Implementation of California Building Code Standards provides for further mitigation of noise impacts.</p>
	Policy 7.b	<p><i>The impact of a proposed development project in existing land uses should be evaluated in terms of the potential for adverse community response based on significant increase in existing noise levels, regardless of compatibility guidelines.</i></p> <p>See explanation of policy 7.a</p>
Regional Coordination	Policy 1.j	<p><i>Land uses in rural areas should be low-intensity and limited in number, and public services to rural areas should be appropriately limited.</i></p> <p>The General Plan designates existing rural areas for low-density uses. The City will meet future housing needs identified in the Housing Element through higher density residential development in existing urbanized areas.</p>
	Policy 1.k	<p><i>Manage and schedule urban growth consistent with the ability to provide a full array of urban services and facilities, such as sewer capacity, water, transportation, schools, public safety and other urban services.</i></p> <p>The RDCS system ensures that development occurs in an orderly manner consistent with the City's ability to provide urban services and facilities.</p>
	Policy 1.l	<p><i>Urban growth should occur in an orderly and contiguous pattern, within designated urban service areas and encouraging infill of vacant urban land.</i></p> <p>See explanation of policy 1.k.</p>
	Policy 1.m	<p><i>Base expansion of urban service areas and annexations on the General Plan, consistent with the City's schedules for development and extension of services.</i></p> <p>See explanation of policy 1.k.</p>